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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TAB PACLEB WY, AND JOSIE
ANNE LADUA LEYSA;
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

WESTWAYS STAFFING
SERVICES, INC., and UHS OF
DELAWARE, INC.,

Defendants.

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*Counsel for Defendant Westways
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Case No. 8:24-cv-00980-DOC-ADS

Assigned for All Purposes to:
Courtroom 10A; Hon. David O. Carter

**JOINT STIPULATION TO
EXCEED PAGE LIMITATION FOR
PLAINTIFFS' OPPOSITION TO
MOTION TO COMPEL
ARBITRATION AND STAY
PROCEEDINGS, OR, IN THE
ALTERNATIVE MOTION TO
DISMISS PLAINTIFFS' AMENDED
COMPLAINT**

Hearing Date: October 7, 2024
Time: 8:30 a.m.
Courtroom: 10A
Hon. David O. Carter

TO THIS HONORABLE COURT:

Plaintiffs Tac Pacleb Wy and Josie Anne Ladau Leysa, on the one hand, and Defendants Westways Staffing Services, Inc. (“Westways”), on the other hand, (collectively “the Parties”), by and through their respective counsel, stipulate, and agree as follows:

WHEREAS, on July 12, 2024, Plaintiffs filed their First Amended Class Action Complaint (Dkt. 35).

WHEREAS, on July 26, 2024, Westways filed its Motion to Compel Arbitration and Stay Proceedings, or, in the Alternative, Motion to Dismiss Plaintiffs’ Amended Complaint (“Motion”) (Dkt. 40).

WHEREAS, on July 26, 2024, Defendant UHS of Delaware, Inc. (“UHS”) filed its Motion to Dismiss Plaintiffs’ First Amended Complaint (Dkt. 42) and Joinder to the Motion (Dkt. 43).

WHEREAS, on September 16, 2024, Plaintiffs’ Opposition to Defendants’ respective motions are due.

WHEREAS, under the Court’s procedures and Local Rule 11-6.1, Memorandum of Points and Authorities are subject to a 25-page limit and 7,000 words, excluding exhibits and indices.

WHEREAS, on August 29, 2024, counsel for the Parties met and conferred, pursuant to Local Rule 7-3, regarding the page limitations for Plaintiffs’ Opposition to the Motion and Westways’ Reply.

WHEREAS, to adequately address both the motion to compel arbitration and motion to dismiss that are raised in the Motion, Plaintiffs request that they be relieved of the word limitation of Local Rule 11-6.1 and be permitted to file a Memorandum of Points and Authorities up to 35 pages, which is an additional 10 pages beyond the page limit set by the Court;

WHEREAS, to adequately respond to Plaintiffs’ Opposition to the Motion, Westways requests an additional five pages for its Reply.

1 WHEREAS, good cause exists for the requested page limit extension because
2 of the important legal issues raised in the Motion, and that Plaintiffs' Opposition to
3 the Motion necessarily covers and addresses a motion to compel arbitration and,
4 alternatively, a motion to dismiss, which if either are granted by the Court, would
5 effectively be dispositive of Plaintiffs' claims. Rather than submit two Oppositions
6 to the Motion, each which would have a 25-page and 7,000-word limitation,
7 Plaintiffs seek to file on a single 35-page Opposition to the Motion.

8 WHEREAS, Westways similarly requests an additional five pages to its Reply
9 in order to address Plaintiffs' Opposition.

10 WHEREAS, the interests of judicial economy, as well as the Parties' interests
11 in conserving resources, are best served by granting this Motion.

12 **THE PARTIES HEREBY STIPULATE AND AGREE:**

13 1. That the page limitation for Plaintiffs' Opposition to Westways Staffing
14 Services, Inc.'s Motion to Compel Arbitration and Stay Proceedings, or, in the
15 Alternative, Motion to Dismiss Plaintiffs' Amended Complaint shall be extended to
16 35 pages and Plaintiffs be relieved of the 7000-word limitation of Local Rule 11-
17 6.1.

18 2. That the page limitation for Westways' Reply shall be extended by five
19 pages.

20 IT IS SO STIPULATED:

21 Dated: September 9, 2024

/s/ Daniel S. Robinson

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Michelle West (SBN 228737)

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Counsel for Plaintiffs and the Putative Class

Dated: September 9, 2024

/s/ Barbara Croutch

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Staffing Services, Inc.*

ATTESTATION REGARDING SIGNATURES

I, Daniel S. Robinson, Esq., attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 9, 2024

/s/ Daniel S. Robinson
Daniel S. Robinson

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2024, I caused the foregoing to be filed electronically using the Court's electronic case filing (ECF) system, which will automatically send a notice of electronic filing to the email addresses of all counsel of record.

Dated: September 9, 2024

/s/ Daniel S. Robinson
Daniel S. Robinson